

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

ADAM GRAD, <i>on Behalf of Himself and</i>)	
<i>All Others Similarly Situated,</i>)	
)	
Plaintiff,)	
)	Civil Action No. 1:22-cv-00449 (RDA/JFA)
vs.)	
)	Class Action
IRONNET, INC., <i>et al.</i> ,)	
)	
Defendants.)	

**Motion for Appointment as Lead Plaintiff and
Approval of Lead Counsel**

Class member Todd M. Frenchman (“Movant”) files this Motion for Appointment as Lead Plaintiff and Approval of Lead Counsel and, for the reasons stated more fully in the memorandum of points and authority, seeks entry of an Order:

- appointing Todd M. Frenchman as Lead Plaintiff pursuant to Section 21D(a)(3) of the Securities Exchange Act of 1934 (the “1934 Act”), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), 15 U.S.C. § 78u-4(a)(3);
- approving Todd M. Frenchman’s selection of the law firm of Bottini & Bottini, Inc. to serve as Lead Counsel for the class; and
- granting such other and further relief as the Court deems just and proper.

Movant respectfully requests that Local Rule 7-E’s meet-and-confer requirement be waived because, under the PSLRA’s procedure, Movant is unaware of the identity of any other entities or persons that would seek appointment as lead plaintiff.

This motion is based on the accompanying memorandum of points and authorities, the Declaration of Albert Y. Chang (with exhibits), the proposed order, and all other papers and

proceedings in this action.

WHEREFORE, Todd M. Frenchman respectfully requests that his Motion be granted and that the Court: (1) appoint Movant as Lead Plaintiff; and (2) approve his selection of Bottini & Bottini, Inc. to serve as Lead Counsel.

Dated: June 21, 2022

Respectfully submitted,

s/ Marla J. Diaz

Marla J. Diaz

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Francis A. Bottini, Jr.. (*pro hac vice* application to be filed)
Albert Y. Chang . (*pro hac vice* application to be filed)
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*Counsel for Movant Todd M. Frenchman and Proposed
Lead Counsel for the Class*

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing was served through the Court's electronic filing and service system this 21st day of June, 2022 to counsel of record.

/s/ Marla J. Diaz
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